## McBride-Ratcliff

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Geotechnical Consultants 7220 Langtry Houston, Texas 77040 713-460-3766

February 4, 1986 MRA File No: 85-317

Mr. John Cochran
Regional Site Project Officer
U.S. Environmental Protection Agency
Region VI
1201 Elm Street
6AW-SE
Dallas, Texas 75270

Dear John:

We have received your comments regarding the South Caval-cade Geophysical Feasibility Survey Report dated December 18, 1985. After reviewing your comments with Koppers Company, we have two primary concerns: 1) defining the purpose of the Task 2 deliverables; and 2) defining the role in which McBride-Ratzliff and Associates (MRA) serves Koppers Company on this project. By way of this correspondence, we hope to resolve our concerns and avoid future problems with project deliverables.

Specifically, in response to your letter dated January 3, 1986, we have the following comments:

1. Task 2 deliverables are looked upon as data or memorandum reports which provide a record of the site investigation data and a brief discussion on data gathering procedures. To provide specific engineering conclusions or recommendations on a particular subtask before the remedial investigation report is completed may be premature and misleading. Therefore, we anticipate that the Task 2 data report deliverables will be submitted for informational purposes only; and will not be contingent upon EPA approval before completing or starting a new subtask.

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- 2. We understand the submission of data report deliverables serves to provide the EPA with preliminary results of our site investigation. The entire field investigation program consists of a series of screening techniques to identify a common goal. As such, data report deliverables are organized to provide the EPA with a clear, concise summary of the site investigation data. Detailed discussions concerning project background and objectives and data evaluation are more appropriately included in the RI report.
- 3. The code of ethics of the American Society of Civil Engineers, the Association of Engineering Geologists and the Association of Independent Professional Geologists clearly prohibits the reporting of biased information or results. As a corporate philosophy, personnel of McBride-Ratcliff and Associates are charged with providing our clients the highest degree of professional standards in our practice. When conducting programs such as the previous geophysical surveys, we report the factual data. We evaluate the factual data to form opinions to be communicated to our clients. Much of the data evaluation is interpretive and is subject to varying opinions; but this is the reason that our interpretations are developed by experienced personnel and peer reviewed by senior personnel experienced in that particular technique or discipline.
- 4. McBride-Ratcliff provides geotechnical and geological services for hazardous waste sites. Certain subtasks of a remedial investigation may require the use of subcontractors for services outside our area of expertise. In these cases, the use of the subcontractor will be clearly identified and the inclusion of subcontractor recommendations and reports will be made as a separate attachment or appendix with a subtask deliverable. Professional practice does not permit us to provide recommendations concerning matters outside our area of expertise.

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Please call if you would like to discuss these concerns in further detail.

Sincerely,

McBRIDE-RATCLIFF AND ASSOCIATES, INC.

William R. Yoli

William R. Tobin, P.E. Project Manager

WRT:JLI:CEW:krr cc: C. Faulds - TWC B. Kier - CDM